

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**DECLARATION OF WENDY S. PLOTKIN**

Wendy S. Plotkin deposes and states as follows:

1. I am an attorney in the law firm of Choate, Hall & Stewart, and a member of the bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts. I am counsel to the above-named defendants and make this declaration in support of the defendants' Motion to Compel Depositions.

2. Attached hereto as Ex. 1 is a true and correct copy of Defendant's First Set of Document Requests to Plaintiff.

3. Attached hereto as Ex. 2 is a true and correct copy of a January 11, 2005 letter from Paul E. Bonanno to Jack C. Schecter.

4. Attached hereto as Ex. 3 is a true and correct copy of a January 12, 2005 letter from Jack C. Sheeter to Paul E. Bonanno.

5. Attached hereto as Ex. 4 is a true and correct copy of the Notice of Rule 30(b)(6) Deposition of ScanSoft, Inc. dated January 12, 2005.

6. Attached hereto as Ex. 5 is a true and correct copy of the Objections to Notice of Rule 30(b)(6) deposition of ScanSoft, Inc. dated January 19, 2005.

7. Attached hereto as Ex. 6 is a true and correct copy of the portion of the deposition transcript of Peter Foster.

8. Attached hereto as Ex. 7 is a true and correct copy of the portion of the deposition transcript of Michael Phillips.

9. Attached hereto as Ex. 8 is a true and correct copy of the Notice of Rule 30(b)(6) Deposition of ScanSoft, Inc. dated January 31, 2005.

10. Attached hereto as Ex. 9 is a true and correct copy of the Objections to Second Notice of Rule 30(b)(6) Deposition of ScanSoft, Inc. dated February 14, 2005.

11. Attached hereto as Ex. 10 is a true and correct copy of a letter from Jack C. Shecter to Paul E. Bonanno dated February 7, 2005.

12. Attached hereto as Ex. 11 is a true and correct copy of a letter from Jack C. Shecter to Paul E. Bonanno dated March 3, 2005.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Wendy S. Plotkin

Dated: April 1, 2005